

217/782-2113

JOINT CONSTRUCTION AND LIFETIME OPERATING PERMIT

PERMITTEE

Harris Marcus Group, Inc.  
Attn: David Marcus  
3757 South Ashland Avenue  
Chicago, Illinois 60609

<u>Application No.:</u> 98030039	<u>I.D. No.:</u> 031600FQK
<u>Applicant's Designation:</u> SPRAYBOOTH	<u>Date Received:</u> April 1, 1999
<u>Subject:</u> Eight New Spray Booths, Two Modified Spray Booths	
<u>Date Issued:</u> November 29, 1999	<u>Operating Permit Expiration</u>
	<u>Date:</u> See Condition 1.
<u>Location:</u> 3737/3757 South Ashland Avenue, Chicago, 60609	

This permit is hereby granted to the above-designated Permittee to CONSTRUCT emission unit(s) and/or air pollution control equipment consisting of:

Eight New Spray Booths and Two Modified Spray Booths

and OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Wood Furniture Coating Line  
Vinyl Coating Line  
Fabric Coating Line  
Plastic/Ceramic Coating Line  
Acrylic Coating Line  
Glass Coating Line  
11.94 mmBtu/Hr Natural Gas Air Make-Up Unit  
Zinc Melting Pot  
Ceramic Mixing Tank  
Brass Plating Tank  
Transfer Tank with Fume Scrubber

pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This operating permit is effective only if the Permittee has complied with all standard conditions of the construction permit.
- b. Operation of the emission units included in this permit shall not begin until all associated air pollution control equipment has been constructed and is operational.

- c. This operating permit shall expire 180 days after the Illinois EPA sends a written request for the renewal of this permit.
- d. This permit shall terminate if it is withdrawn or is superseded by a revised permit.
- 2. These conditions effectively limit the potential emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material to less than 25 tons per year, individual hazardous air pollutants (HAP) to less than 10 tons per year, and a combination of such HAP to less than 25 tons per year). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit.

- 3a. Emissions and operation of all VOM emitting emission units at the source (including both existing spray booths and the eight new spray booths and two modified spray booths) shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Coating and Cleanup	3.0	23.3	3.0	23.3

These limits are based on the maximum material usage and the maximum VOM contents of the coatings and solvents used. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- c. The VOM content of the coatings applied in all spray booths at the source shall not exceed the following emission limitations:

<u>Substrate Category</u>	<u>Coating Subcategory</u>	<u>Emission Limitation</u>
Metal Furniture	Air Dried	2.8
	Baked	2.3

These emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator.

- d. This permit is issued based on the potential emissions of VOM from the source not exceeding 25 tons per year. As a result, the source is exempt from the emission limitations specified in 35 Ill. Adm. Code 218.204(1) - Wood Furniture Coating. This condition is required to meet the exemption limit specified in 35 Ill. Adm. Code 218.208(b) (2).
- e. Emissions from the fabric coating operations shall not exceed 15 lbs/day before the application of capture systems and control devices. As a result, the source is exempt from the emission limitations specified in 35 Ill. Adm. Code 218.204(e) - Fabric Coating. This condition is required to meet the exemption limit specified in 35 Ill. Adm. Code 218.208(a).
- f. Emissions from the vinyl coating operations shall not exceed 15 lbs/day before the application of capture systems and control devices. As a result, the source is exempt from the emission limitations specified in 35 Ill. Adm. Code 218.204(e) - Vinyl Coating. This condition is required to meet the exemption limit specified in 35 Ill. Adm. Code 218.208(a).
- g. This permit is issued based on the potential emissions of VOM from the source not exceeding 25 tons per year. As a result, the source's Plastic/Ceramic, Acrylic, and Glass coating operations are exempt from the control requirements specified in 35 Ill. Adm. Code 218.986 - Subpart TT. This condition is required to meet the exemption limit specified in 35 Ill. Adm. Code 218.980(b) (1).
- 4a. Emissions and operation of the 11.94 mmBtu/hr natural gas fired air make-up unit shall not exceed the following limits:

Fuel Usage		Pollutant	Emission	Emissions	
(mmscf/Mo)	(mmscf/Yr)		Factor (Lb/mmscf)	(Ton/Mo)	(Ton/Yr)
3.2	37.8	NO <sub>x</sub>	100	0.2	1.9
		CO	84	0.2	1.6
		PM	7.6	0.1	0.2
		VOM	5.5	0.1	0.1
		SO <sub>2</sub>	0.6	0.1	0.1

These limits are based on maximum fuel usage and standard emission factors. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas shall be the only fuel(s) fired in the boiler. Use of any other fuel will require a revised permit.

5. This permit is issued based on negligible emissions of particulate matter from zinc melting pot, ceramic mixing tank, brass plating tank, and transfer tank with fume scrubber. For this purpose emissions from each emission source shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
6. The VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the required recordkeeping requirements.
7. The Permittee shall maintain monthly records of the following items:
  - a. For sources exempt under 35 Ill. Adm. Code 218.208(a), the owner or operator shall collect and record all of the following information each day for each fabric and vinyl coating line and maintain the information at the source for a period of three years:
    - i. The name and identification number of each coating as applied on each coating line; and
    - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
  - b. For sources exempt under 35 Ill. Adm. Code 218.208(b), the owner or operator shall collect and record all of the following information for each wood furniture coating line and maintain the information at the source for a period of three years:
    - i. The name and identification number of each coating as applied on each coating line; and
    - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied on each coating line on a monthly basis.
  - c. The owner or operator shall collect and record all of the following information each day for each metal furniture coating line and maintain the information at the source for a period of three years:
    - i. The name and identification number of each coating as applied on each coating line; and

- ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
  - d. VOM and HAP usage for all emission units (tons/month and tons/year).
- 8. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
- 9. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
- 10. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Eisenhower Tower  
1701 South First Avenue  
Maywood, Illinois 60153

- 11. Persons with lifetime operating permits must obtain a revised permit for any of the following changes at the source:
  - a. An increase in emissions above the amount the emission unit or the source is permitted to emit;

- b. A modification;
- c. A change in operations that will result in the source's noncompliance with conditions in the existing permit; or
- d. A change in ownership, company name, or address, so that the application or existing permit is not longer accurate.

It should be noted that the following equipment is exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146:

<u>Emission Unit</u>	<u>Exemption</u>
Planer with Control	35 Ill. Adm. Code 201.146(aa), (jj)
Cut Off Saw with Control	35 Ill. Adm. Code 201.146(aa), (jj)
Sanding Line-Auto with Control	35 Ill. Adm. Code 201.146(aa), (jj)
4.2 mmBtu/Hr Natural Gas Heating Boiler	35 Ill. Adm. Code 201.146(d)
8.0 mmBtu/Hr Natural Gas Heating Boiler	35 Ill. Adm. Code 201.146(d)
7.1 mmBtu/Hr Natural Gas Heating Boiler	35 Ill. Adm. Code 201.146(d)

If you have any questions on this permit, please contact Jason Schnepf at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:JMS:jar

cc: Region 1